



MITCHELL SILBERBERG & KNUPP LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Eleanor M. Lackman
Partner
(212) 878-4890 Phone
eml@msk.com

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VIA ECF

The Honorable Mary Kay Vyskocil, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 2230
New York, New York 10007

Re: ***Penske Media Corp. v. Shutterstock, Inc.***, 20-cv-4583 (MKV);
Letter Motion to Seal

Dear Judge Vyskocil:

We are counsel for defendant-counterclaim plaintiff Shutterstock, Inc. (“Shutterstock”) in the above-referenced action. In accordance with Section 9.B of Your Honor’s Individual Rules, the Court’s Standing Order 19-mc-00583, and ECF Rules & Instructions Section 6, we respectfully submit this letter to request that the Court seal the unredacted version of Shutterstock’s Counterclaim, including, in particular, certain confidential financial terms related to the parties’ contract at issue in this action.

The proposed redactions are consistent with the redactions that have already been approved by the Court. *See, e.g.*, Dkt. Nos. 25, 41.

As explained in Shutterstock’s prior requests to seal (Dkt. Nos. 23, 28), which Shutterstock incorporates herein by reference, sealing the unredacted version of Shutterstock’s Counterclaim is appropriate and warranted here. The financial terms that Shutterstock seeks to redact are of the type that courts “routinely permit parties to redact” from public filings. *Graczyk v. Verizon Commc’ns, Inc.*, No. 18-CV-6465 (PGG), 2020 WL 1435031, at *9 (S.D.N.Y. Mar. 24, 2020) (collecting cases). Moreover, Shutterstock’s proposed redactions to the contract are narrowly tailored and seek to protect only those limited portions of the Counterclaim concerning financial terms of the contract that have not otherwise been publicly disclosed, and no less restrictive means exist to prevent disclosure to the public.

Accordingly, Shutterstock respectfully requests that this Court grant this motion to seal.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'EML', with a stylized flourish at the end.

Eleanor M. Lackman